

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

July 1, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**
WC Docket No. 14-58 - ETC Annual Reports and Certifications

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report and Service Outage Reporting included in FCC Form 481

Confidential Financial Information – Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 14-58, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Seneca Telephone Company (the Company), Study Area Code 421945 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. The Company, by its authorized representative, hereby requests confidential treatment of three attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report, (2) the financial annual report, and (3) service outage reporting, all of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report and the service



outage reporting is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's June 17, 2015 *Protective Order* in WC Docket No. 10-90 *et al.* These attachments contain competitively sensitive data that Seneca Telephone Company maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

Five-Year Service Quality Improvement Plan Progress Report and Service Outage Reporting

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, Seneca Telephone Company requests that the text and data extracted from its five-year service quality improvement plan progress report and the service outage Reporting be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Company's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

Attachment to Line 200 of FCC Form 481 – Service Outage Reporting. Confidential treatment is sought for all information in the service outage report specifically related to the Company's access line counts.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1). Section 200 requires eligible telecommunications carriers

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to report outage information of at least 30 minutes in duration and impacts at least ten percent of the end users served in the service area or 911 special facility pursuant to 47 C.F.R. §54.313(a)(2).

- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Company's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a map of the Company's service area detailing progress toward meeting broadband deployment targets at the wire center level. The service outage information contains access line information which could cause harm to the competitive position of the Company. The required information in both instances contains closely guarded, privileged information that the Company does not make publicly available.

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband service and voice service are both subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless providers that have voice and data plans. Most RLECs also face competition from at least one other wireline voice and broadband provider such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report and the outage reporting would provide competitors with detailed, granular information regarding the Company's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

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- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan progress report and the access counts provided in the service outage reporting as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report and service outage reporting is not available to the public, and third party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Company's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period. The Company also requests that the service outage information be withheld from public inspection indefinitely because of the ongoing competitive harm it may cause.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

**Financial Annual Report**

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Seneca Telephone Company seeks confidential treatment of its financial annual report pursuant to the June 17, 2015 *Protective Order* in WC Docket No. 10-90, *et al.*¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Seneca Telephone Company is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the Service Outage Reporting (Voice) confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, 14-58, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED – FOR PUBLIC INSPECTION."

Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system.

¹ *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 (rel. June 17, 2015).

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This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Deb Morgan". The signature is written in a cursive style with a large, looped "D" and "M".

Deb Morgan
Authorized Representative for
Seneca Telephone Company

DM/pjf

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of non-redacted submission)

Mr. Jay Mitchell, Seneca Telephone Company

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Dianne Stanley
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	dstanley@kc.rr.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313	54.422
	Completion Required	Completion Required

<100>	Service Quality Improvement Reporting	(complete attached worksheet)	(check box when complete)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<210>	<input type="text"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<410>	Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<420>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<440>	Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<510>	<div style="border: 1px solid black; padding: 5px;">421945ok510.pdf</div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<610>	<div style="border: 1px solid black; padding: 5px;">421945ok610.pdf</div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	<input checked="" type="radio"/> <input type="radio"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification	<input type="text" value="Yes"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1010>	<div style="border: 1px solid black; padding: 5px;">421945ok1010.pdf</div> (attach descriptive document)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1110>		(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

<2000>	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>		(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>		(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Dianne Stanley 417762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/> (yes / no) <input type="radio"/> <input type="radio"/>
<111>		

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

421945ok112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code

421945

<015>	Study Area Name
-------	-----------------

SENECA TEL CO

<020>	Program Year
-------	--------------

2016

<030> Contact Name - Person USAC should contact regarding this data

Dianne Stanley

<035> Contact Telephone Number - Number of person identified in data line <030>

4177762247 ext.

<039>	Contact Email Address - Email Address of person identified in data line <030>

dstanley@kc.rr.com

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com
<810>	Reporting Carrier	Seneca Telephone Company.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Seneca Telephone Company

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.irf.com

Peoria Tribe	
Eastern Shawnee Tribe	
Modoc Tribe	
Wyandotte Nation Tribe	
Seneca Cayuga Tribe	

421945ok920 .pdf

Name of Attached Document

[illegible]

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- | | |
|-------|------------------------------------------------------------------------------------------------|
| <921> | Needs assessment and deployment planning with a focus on Tribal community anchor institutions. |
| <922> | Feasibility and sustainability planning; |
| <923> | Marketing services in a culturally sensitive manner; |
| <924> | Compliance with Rights of way processes |
| <925> | Compliance with Land Use permitting requirements |
| <926> | Compliance with Facilities Siting rules |
| <927> | Compliance with Environmental Review processes |
| <928> | Compliance with Cultural Preservation review processes |
| <929> | Compliance with Tribal Business and Licensing requirements. |

(1100) No Terrestrial Backhaul Reporting

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	
<039>	Contact Email Address - Email Address of person identified in data line <030>	

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	datanley@kc.rr.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>421945ok1210.pdf</div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	
<015>	Study Area Name	421945
<020>	Program Year	SENeca TEL CO
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	Dianne Stanley
<039>	Contact Email Address - Email Address of person identified in data line <030>	4177762247 ext.
		dstanley@kc-rr.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

Certification Support Used to Build Broadband

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Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

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- <2021> Interim Progress Community Anchor Institutions

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Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc-rr.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan	
	Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div>421945ok3010.pdf</div>

Name of Attached Document Listing Required Information

(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input checked="" type="checkbox"/>
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(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	<div>421945ok3012.pdf</div>
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Name of Attached Document Listing Required Information

(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input checked="" type="checkbox"/>
(3014)	If yes, does your company file the RUS annual report	<input checked="" type="checkbox"/>

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input checked="" type="checkbox"/>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>

(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div>421945ok3017.pdf</div>
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Name of Attached Document Listing Required Information

(3018)	If the response is no on line 3014, Is your company audited?	<input checked="" type="checkbox"/>
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If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit	<input type="checkbox"/>

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>

(3026)	Attach the worksheet listing required information	<div></div>
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Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

Data Collection Form

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

**Certification - Reporting Carrier
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421945
<015>	Study Area Name	SENECA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035>	Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	421945
<015> Study Area Name	SENECA TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Dianne Stanley
<035> Contact Telephone Number - Number of person identified in data line <030>	4177762247 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dstanley@kc.rr.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Deb Morgan</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Deb Morgan
Name of Reporting Carrier:	SENECA TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 07/01/2015
Printed name of Authorized Officer:	Walter Mitchell
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	4177762247 ext.
Study Area Code of Reporting Carrier:	421945 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	SENECA TEL CO
Name of Authorized Agent or Employee of Agent:	Deb Morgan
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 07/01/2015
Printed name of Authorized Agent or Employee of Agent:	Deb Morgan
Title or position of Authorized Agent or Employee of Agent:	Manager
Telephone number of Authorized Agent or Employee of Agent:	5123432544 ext.
Study Area Code of Reporting Carrier:	421945 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

**LINE 112 – FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN
PROGRESS REPORT**

[REDACTED]

[REDACTED]

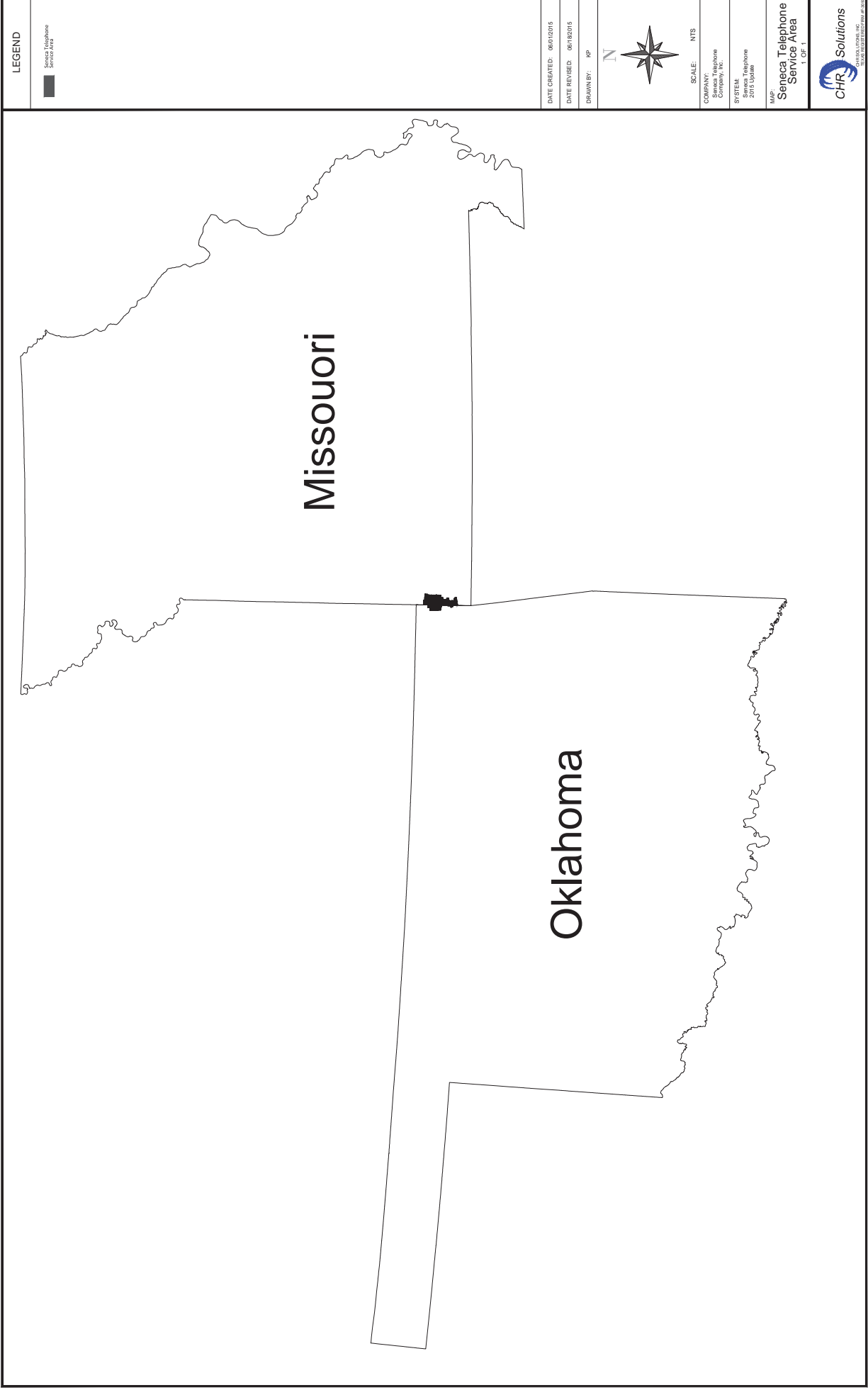
[REDACTED]

Service Quality Improvement Plan Progress Report

Exchange	Description of Improvement	2015 Forecast	2015 Progress (Jan.-Jun.)
Seneca	[REDACTED]	[REDACTED]	[REDACTED]
Tiff City	[REDACTED]	[REDACTED]	[REDACTED]
GRAND TOTAL		[REDACTED]	[REDACTED]






2015 Progress Report Description







LEGEND

-  General Office
-  Equipment Site
-  Exchange Boundary
-  2015 Quality Improvement Areas
-  County Line

System Level Improvements - No
System Level Additions Proposed

DATE CREATED: 08/01/2015
DATE REVISED: 08/18/2015
DRAWN BY: KP



SCALE: NTS

COURTNEY
Seneca Telephone
Company, Inc.

SYSTEM
FCC ETC 5 Year Plan
2015 Update

MAP:
Seneca Telephone
Service Area
1 OF 1



LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Seneca Telephone Company (the “Company”) complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The rates, terms, and conditions under which the Company operates are outlined in its Local Exchange Tariffs, which are approved by the Missouri Public Service Commission (“Missouri PSC”). The tariff contains provisions regarding the Company’s customer service and protection practices.

Service quality standards for voice service are established by the Missouri PSC. The Company consistently meets or exceeds those standards and provides reports to the Missouri PSC, in accordance with the Missouri PSC’s rules.

With regard to broadband service, the Company provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a “best effort” service and are dependent upon a number of variables, many of which are outside the control of the Company.

The Company complies with any and all consumer protection obligations under state law.

The Company also complies with the following consumer best practices: (1) the Company discloses its rates and terms of service to customers; (2) the Company provides specific disclosures in its advertising; (3) the Company separately identifies carrier charges from taxes on its billing statements; (4) the Company provides ready access to customer service; (5) the Company promptly responds to consumer inquiries and complaints received from government agencies; and (6) the Company abides by policies for protection of consumer privacy.

Finally, the Company has a policy and established operating procedures that comply with the FCC’s Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Company’s compliance with CPNI rules and a description of the Company’s operating procedures that ensure compliance are filed annually with the FCC.

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Seneca Telephone Company certifies that it is able to function in emergency situations pursuant to the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹. The Company has permanently mounted standby generators at the main switching office of each wire center with capacity to provide emergency AC service in the event of a power outage. In addition to the permanently mounted generators at each wire center, the company has several portable generators to provide AC service at digital line concentrator sites within each wire center's exchange area to ensure functionality when commercial power is not available at these locations. The network is capable of managing traffic spikes resulting from emergency situations.

Toll service(s) are provided over fiber optic facilities which are arranged to ring protect should a fiber breakage or a hardware failure occur. In addition to the toll service ring facilities, remote offices are protected with fiber ring facilities for the host/remote office links. Although the Company's ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations including demonstration that it has a reasonable amount of back-up-power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

LINE 920 – TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION

Seneca Telephone Company provides business and residential facilities and services within the tribal areas of the Peoria, Eastern Shawnee, Modoc, Wyandotte Nation and Seneca Cayuga Tribes of Oklahoma.¹

During the reporting period of 2014, the Company had not been contacted by any Tribal representative about the Company's service offerings in Oklahoma other than the Eastern Shawnee Tribe.

Seneca Telephone Company periodically contacts each to determine if any additional services and/or requirements are necessary or planned. During 2014, the Eastern Shawnee Tribe requested voice and data for a planned casino within the Seneca exchange area. These requests consisted of SIP based trunks for an IP-PBX, analog POTS lines for FAX services, a dedicated fiber link to interconnect 3 casinos together, high speed DSL, and HI-CAP digital T1 special service circuits for the gaming companies. Seneca Telephone Company provided these services within time to open the casino as planned.

¹ FCC Public Notice, DA12-1165, released July 19, 2012, footnote 2, states, "In the context of the *USF/ICC Transformation Order*, "Tribal lands" is defined as "any federally recognized Indian tribe reservation, pueblo or colony, including former reservations in Oklahoma..."

LINE 1010 – VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$47.48, which includes the federal subscriber line charge ("SLC").¹

In all of the exchanges served by Seneca Telephone Company ("the Company"), the single-line residential local rate, including any mandatory extended area service charge, is \$14.00. When the federal SLC (\$6.50) and the state universal service fee (\$.02) are included, the rate becomes \$20.52. Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of \$47.48.

¹ *Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes*, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS

Oklahoma residential customers of Seneca Telephone Company (“the Company”) who qualify for the Lifeline Program receive a state discount of \$19.50.

The Lifeline single-line residential rate, including any mandatory extended area service charge and the federal subscriber line charge (“SLC”) is \$1.00 (\$20.50 standard rate - \$19.50 discount). This rate applies to the following exchanges: Seneca and Tiff City.

Missouri Residential customers of Seneca Telephone Company who qualify for the Lifeline Program receive a Lifeline Program discount of \$15.75 (9.25 Lifeline federal discount + \$6.50 Lifeline state discount).

The Lifeline single-line residential rate, including any mandatory extended area service charge and the federal subscriber line charge (“SLC”) is \$4.75 (\$20.50 standard rate - \$15.75 discount). This rate applies to the following exchanges: Seneca and Tiff City Exchanges.

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within their local calling area.

Toll charges for calls outside of the local calling area are determined by the long distance carrier of the customer’s choosing. Customers may elect to subscribe to toll blocking at no charge.

The Company does not disconnect the service of Lifeline subscribers for the non-payment of toll charges. However, the Company reserves the right to implement toll blocking, at no charge, if the customer incurs a significant balance of unpaid toll bills.

Lifeline Program reductions do not apply to additional services such as information-related services and custom calling features. Lifeline customers may subscribe to these services, where available, at the same rates offered to other customers.

The attached pages from the Company’s Telephone Services Tariff include the terms and conditions for Lifeline Service in Missouri and Oklahoma.

LOCAL EXCHANGE TARIFFS

Lifeline Service

A. General Regulations

1. Lifeline service is available to qualifying low-income subscribers for single-party residence service.
2. The monthly discount will be the maximum amount allowed by the Missouri Public Service Commission and the Federal Communications Commission; however, this discount will not exceed the sum of the federal subscriber line charge and the recurring charges for voice telephony service. The monthly discount will be the same for Lifeline customers solely subscribing to voice telephony service and for Lifeline customers subscribing to a bundle of services.
3. Lifeline will not be furnished on a Foreign Exchange service.
4. Lifeline service shall not be disconnected for non-payment of toll charges.
5. Toll blocking provides a means of restricting access to the Long Distance Message Telecommunications Network. Toll blocking for the purposes of lifeline service will restrict 1+, 0+ and 0- (operator handled) calls.
 - a. If the customer chooses "toll blocking" the company will not charge a service deposit.
 - b. Toll blocking is offered to Lifeline subscribers at no charge.

(T)

(T)

(D)

(D)

(D)

*Indicates new rate or text
+Indicates change

Issued: March 16, 2012

W. Jay Mitchell
Seneca Telephone Company
P.O. Box 329
Seneca, MO 64865

Effective: April 15, 2012

FILED
Missouri Public
Service Commission
JI-2012-0468

LOCAL EXCHANGE TARIFFS

Lifeline Service (Cont'd)

B. Eligibility Requirements

1. An applicant must meet all of the following criteria in order to qualify for Lifeline Service.

- a. To qualify for Lifeline the consumer must participate in one of the following programs:

- | | | |
|----|----------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| 1) | Mo HealthNet (f/k/a Medicaid) | (T) |
| 2) | Food stamps | |
| 3) | Supplemental Security Income (SSI) | |
| 4) | Federal Public Housing Assistance or Section 8 | |
| 5) | Low Income Home Energy Assistance Program | |
| 6) | National School Free Lunch Program | (T) |
| 7) | Temporary Assistance for Needy Families, or | (T) |
| 8) | The customer's income, as defined in 47 CFR §54.400(f), is at or below 135% of the Federal Poverty Guideline (effective June 1, 2012). | (N)

(N) |

2. The customer must sign, under penalty of perjury a document certifying:

- a. He/she is receiving benefits from one of the programs in 1.a. above.
- b. Name of the program(s) from which they are receiving benefits.
- c. That he/she will notify the company if he/she no longer participates in the program(s) named in a. preceding.

3. The premises at which the residence service is requested must be the applicant's principal place of residence.

4. There is only one telephone line serving the residence premises. The residence premises household (dwelling unit) shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic establishment.

A. Missouri Universal Service Fund Low-Income Assistance

1. **General**-A low-income customer is any customer who requests or received residential essential local telecommunications service and who has been certified by the Department of Social Services (DSS) as economically disadvantaged. Qualified individuals will receive discounted services under either the low-income assistance or the disabled assistance program.
2. **Regulations**-Low income assistance is available to all residential customers who demonstrate, by self certifying with the company under penalty of perjury, that they are eligible for support by participation in:
 - a) Mo HealthNet (f/k/a Medicaid) (T)
 - b) Food Stamps
 - c) Supplemental Security Income (SSI)
 - d) Federal Public Housing Assistance or Section 8
 - e) Low Income Home Energy Assistance Program
 - f) National School Free Lunch Program (T)
 - g) Temporary Assistance for Needy Families, or (T)
 - h) The customer's income, as defined in 47 CFR §54.400(f), is at or below 135% of the Federal Poverty Guideline (eff. June 1, 2012). (N)
3. **Eligible Services** – Essential local telecommunications service is defined as two (2) way switched voice residential service within a local calling scope as determined by the commission, comprised of the following services and their recurring charges: (T)
 - a) Single line residential service, including touch-tone dialing and any applicable mileage or zone charges
 - b) Access to local emergency service, including, but not limited to, 911 service established by local authorities
 - c) Access to basic local operator services
 - d) Access to basic local directory assistance
 - e) Standard intercept service
 - f) Equal access to Inter-Exchange Carriers consistent with rules and regulations of the FCC
 - g) One (1) standard white pages directory listing
 - h) Toll blocking or toll control for qualifying low-income customers

4. **Support Amount** – Customers eligible under the established criteria can receive a discount from their bill for essential local telecommunications service equal to the amounts approved by the Missouri Public Service Commission and the Federal Communications Commission. The amount of combined federal and state lifeline support for any customer will not exceed the sum of the federal Subscriber Line Charge (SLC) and the recurring charges for essential local telecommunications services (including the basic service rate, Touch-Tone calling charge, extended area service additive, and mileage additives, if any).

B. Missouri Universal Service Fund Disabled Assistance

1. **General** – A disabled customer, or a dependent of a disabled customer, is a customer who requests or receives essential local telecommunications service, as defined in this tariff, and meets the eligibility requirements set forth in this tariff.
2. **Regulations** – Disabled assistance is available to all residential customer who demonstrate, by self certifying with the company under penalty of perjury, that they, or a dependent, are totally and permanently disabled or blind and receiving any of the following:
- a) Federal Social Security Disability benefits
 - b) Federal Supplemental Security income benefits
 - c) Veterans Administration benefits
 - d) State blind pension pursuant to Section 209.010 to 209.160, RSMo
 - e) State aid to blind persons pursuant to Section 209.240 RSMo.
 - f) State supplemental payments pursuant to Section 208.030, RSMo Section 660.100.2 RSMo 2000.
3. **Support Amount** – Customers eligible under the established criteria can receive a discount equal to the amount approved by the Missouri Public Service Commission from their bill for essential local telecommunications service. The amount of state lifeline support for any customer will not exceed the recurring charges for essential local telecommunications services (including the basic service rate, Touch-Tone calling charge, extended area service additive, and mileage additives, if any).

*Indicates new rate or text

+Indicates change

Issued: May 18, 2005

Effective: June 17, 2005

W. Jay Mitchell
President
Seneca Telephone Company
P.O. Box 329
Seneca, MO 64865

C. Missouri Universal Service Fund

1. Company will place on each retail end-user customer's bill, a surcharge equal to the Missouri Universal Service Fund percentage assessment ordered by the commission.
2. The surcharge will appear as a separate line item detailed as "Missouri Universal Service Fund."
3. The surcharge percentage will be applied to the total of each customer's charges for intrastate regulated telecommunications services that meet the definition of net jurisdictional revenues at 4 CSR 240-31.010(12).

*Indicates new rate or text
+Indicates change

Issued: May 18, 2005

Effective: June 17, 2005

W. Jay Mitchell
President
Seneca Telephone Company
P.O. Box 329
Seneca, MO 64865

LOCAL EXCHANGE SERVICE

14.093y

V. LIFELINE SERVICE

AT

A. Applicability

1. Lifeline Service is a voice telephony service assistance program designed to provide eligible residential customers with a credit to be applied to the price of Residential voice telephony service.
2. Eligible customers will receive a credit as set forth in Section IV. Lifeline Credits below, to be applied to their Residential voice telephony service.
3. Customers shall not receive more than one Lifeline credit regardless of the number of residential voice telephony services or locations the customer receives service within the State of Oklahoma.
4. Lifeline Service shall not be available on a retroactive basis.

B. Designated Services Available to Lifeline Customers (1)

The following services shall be offered to eligible Lifeline customers:

1. voice telephony services that provide voice grade access to the public switched network or its functional equivalent;
2. minutes of use for local service provided at no additional charge to end users;
3. access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and
4. toll limitation services to qualifying low-income consumers as provided in 47 CFR §54.400.

C. Eligibility Requirements for Lifeline Service On Non-Tribal Lands

1. The customer, one or more of the customer's dependents, or the customer's household (applicant) seeking Lifeline service credit must provide documentation to the Company establishing that the applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.

AT

Lifeline service may not be disconnected for non-payment of toll charges.

Public Utility Division
201400093y
Tariff Sheets Approved
per 165:55-5-10(c)
Issued: 10-31-14

LOCAL EXCHANGE SERVICE

AT

V. LIFELINE SERVICE

C. Eligibility Requirements for Lifeline Service On Non-Tribal Lands (Continued)

- a. The applicant must receive benefits from one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Supplemental Security Income; Federal Public Housing Assistance (Section 8); Low-Income Home Energy Assistance Program; National School Lunch Program's free lunch program; or Temporary Assistance for Needy Families; or
 - b. An applicant's household income as defined in 47 CFR § 54.400(f) must be at or below 135% of the Federal Poverty Guidelines for a household of that size; or
 - c. Participate in or receive assistance or benefits, as certified by the Oklahoma Department of Human Services, under a program providing Temporary Assistance to Needy Families; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Medical Assistance or Medicaid; or Supplemental Security Income.
 - d. Participate in or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under a program providing vocational rehabilitation, including aid to the hearing impaired; or
 - e. Participate in or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant to the Sales Tax Relief Act, 68 O.S. § 5011 et seq.
2. In addition to meeting the qualifications provided in paragraphs a. through e. above, in order to constitute a qualifying low-income applicant, an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service.
 3. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
 4. Upon receipt of the applicant's documentation, in accordance with 47 CFR § 54.410, establishing eligibility for Lifeline credit, and the Company's provisioning of Lifeline service to the applicant the Company will begin providing the credit.

AT

Public Utility Division
201400093y
Tariff Sheets Approved
per 165:55-5-10(c)
Issued: 9-31-14

LOCAL EXCHANGE SERVICE

V. LIFELINE SERVICE

C. Eligibility Requirements for Lifeline Service On Non-Tribal Lands (Continued)

5. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually, in accordance with 47 CFR § 54.410.
6. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

D. Lifeline Credits for Lifeline Service On Non-Tribal Lands

	<u>Monthly Credit</u>
Federal Lifeline Credit:	\$9.25 ¹

AT

AT

Public Utility Division
201400093 Approved
Tariff Sheets
per 165:55-5-10(c)
Issued: 10-31-14

1. Pursuant to OAC 165:55-13-14 (e) the credit applied will not exceed the total of the federal end user charge and the residential local exchange rate, less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.

LOCAL EXCHANGE SERVICE

V. LIFELINE SERVICE

AT

E. Eligibility Requirements for Lifeline Service On Tribal Lands

1. The customer, one or more of the customer's dependents, or the customer's household (applicant) seeking Lifeline service credit must provide documentation to the Company establishing that the applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.
 - a. The applicant must receive benefits from one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Supplemental Security Income; Federal Public Housing Assistance (Section 8); Low-Income Home Energy Assistance Program; National School Lunch Program's free lunch program; or Temporary Assistance for Needy Families; or
 - b. An applicant's household income as defined in 47 CFR § 54.400(f) must be at or below 135% of the Federal Poverty Guidelines for a household of that size; or
 - c. Participate in or receive assistance or benefits, as certified by the Oklahoma Department of Human Services, under a program providing Temporary Assistance to Needy Families; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Medical Assistance or Medicaid; or Supplemental Security Income.
 - d. Participate in or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under a program providing vocational rehabilitation, including aid to the hearing impaired; or
 - e. Participate in or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant to the Sales Tax Relief Act, 68 O.S. § 5011 et seq.
 - f. A customer who lives on Tribal lands is eligible for Lifeline service as a "qualifying low-income consumer" as defined by 47 CFR § 54.400(a) and as an "eligible resident of Tribal lands" as defined by 47 CFR § 54.400(e) if that customer meets the qualifications for Lifeline specified in paragraphs a. through e. above or if the customer, one or more of the customers dependents, or the

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Public Utility Division
201400093y
Tariff Sheets Approved
per 165:55-5-10(c)

LOCAL EXCHANGE SERVICE

V. LIFELINE SERVICE

AT

E. Eligibility Requirements for Lifeline Service On Tribal Lands (continued)

customers household participates in one of the following Tribal-specific federal assistance programs: Bureau of Indian Affairs general assistance; Tribally administered Temporary Assistance for Needy Families; Head Start (only those households meeting its income qualifying standard); or the Food Distribution Program on Indian Reservations.

2. In addition to meeting the qualifications provided in paragraphs a. through e. above, in order to constitute a qualifying low-income applicant, an applicant must not already be receiving a Lifeline service, ~~and there must not be anyone else in the applicant's household~~ subscribed to a Lifeline service.
3. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
4. Upon receipt of the applicant's documentation, in accordance with 47 CFR § 54.410, establishing eligibility for Lifeline credit, and the Company's provisioning of Lifeline service to the applicant the Company will begin providing the credit.
5. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually, in accordance with 47 CFR § 54.410.
6. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

Lifeline Credits for Lifeline Service On Tribal Lands

	<u>Monthly Credit</u>
Federal Lifeline Credit:	\$34.25 ²

AT

Public Utility Division
201400093y
Tariff Sheet Approved
per 165:35-5-10(c)
Issued: 10-31-14

² Pursuant to OAC 165:35-13-14 (c) the credit applied will not exceed the total of the federal end user charge and the residential local exchange rate, less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.

LINE 3010 – MILESTONE CERTIFICATION

Seneca Telephone Company. (the “Company”) hereby certifies that the Company has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to reasonably comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

LINE 3012 – COMMUNITY ANCHOR INSTITUTIONS

Seneca Telephone Company did not newly deploy broadband service to any community anchor institutions in the preceding calendar year (2014).

USDA-RUS

This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

BORROWER NAME

Seneca Telephone Company

(Prepared with Audited Data)

TRUCTIONS-Submit report to RUS within 30 days after close of the period.
detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.

PERIOD ENDING
December, 2014

BORROWER DESIGNATION
MO0505

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII
(Check one of the following)

☒ All of the obligations under the RUS loan documents have been fulfilled in all material respects.

☐ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

JAY MITCHELL

6/12/2015

DATE

PART A. BALANCE SHEET

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
Cash and Equivalents			5. Accounts Payable		
Cash-RUS Construction Fund			6. Notes Payable		
Affiliates:			7. Advance Billings and Payments		
a. Telecom, Accounts Receivable			8. Customer Deposits		
b. Other Accounts Receivable			9. Current Mat. L/T Debt		
c. Notes Receivable			10. Current Mat. L/T Debt-Rur. Dev.		
Non-Affiliates:			11. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			12. Income Taxes Accrued		
b. Other Accounts Receivable			13. Other Taxes Accrued		
c. Notes Receivable			14. Other Current Liabilities		
Interest and Dividends Receivable			15. Total Current Liabilities (25 thru 34)		
Material-Regulated			LONG-TERM DEBT		
Material-Nonregulated			16. Funded Debt-RUS Notes		
Prepayments			17. Funded Debt-RTB Notes		
Other Current Assets			18. Funded Debt-FFB Notes		
Total Current Assets (1 Thru 9)			19. Funded Debt-Other		
NONCURRENT ASSETS			20. Funded Debt-Rural Develop. Loan		
Investment in Affiliated Companies			21. Premium (Discount) on L/T Debt		
a. Rural Development			22. Reacquired Debt		
b. Nonrural Development			23. Obligations Under Capital Lease		
Other Investments			24. Adv. From Affiliated Companies		
a. Rural Development			25. Other Long-Term Debt		
b. Nonrural Development			26. Total Long-Term Debt (36 thru 45)		
Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
Other Noncurrent Assets			27. Other Long-Term Liabilities		
Deferred Charges			28. Other Deferred Credits		
Jurisdictional Differences			29. Other Jurisdictional Differences		
Total Noncurrent Assets (11 thru 16)			30. Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
Telecom, Plant-in-Service			31. Cap. Stock Outstand. & Subscribed		
Property Held for Future Use			32. Additional Paid-in-Capital		
Plant Under Construction			33. Treasury Stock		
Plant Adj., Nonop. Plant & Goodwill			34. Membership and Cap. Certificates		
Less Accumulated Depreciation			35. Other Capital		
Net Plant (18 thru 21 less 22)			36. Patronage Capital Credits		
TOTAL ASSETS (10+17+23)			37. Retained Earnings or Margins		
			38. Total Equity (51 thru 57)		
			39. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

Total Equity = 66.75% % of Total Assets

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M00505

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INSTRUCTIONS- See RUS Bulletin 1744-2

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 5 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or Margins (21+27+28+29+30-26)		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11) / 7]		
46. Operating Accrual Ratio [(14+20+26) / 7]		
47. TIER [(31+26) / 26]		
48. DSCR [(31+26+10+11) / 44]		

PART C: SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION							
EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1	R-1	BUSINESS	RESIDENTIAL	TOTAL	TOTAL (including fiber)	FIBER
	(a)	(b)	(a)	(b)	(c)	(a)	(b)
666 - OK							
775 - MO							
776 - MO							
985 - OK							
MobileWireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges							

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INSTRUCTIONS - See RUS Bulletin 1744-2

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION**4. BROADBAND SERVICE****Details on Least Expensive Broadband Service**

EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
666 - OK								
775 - MO								
776 - MO								
985 - OK								
Total								

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INSTRUCTIONS- See RUS Bulletin 1744-2

PART D. SYSTEM DATA

1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile
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PART E. TOLL DATA

1. Study Area ID Code(s)	2. Types of Toll Settlements (Check one)
a. 421945	Interstate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis
b. _____	Intrastate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis
c. _____	
d. _____	
e. _____	
f. _____	
g. _____	
h. _____	
i. _____	
j. _____	

PART F. FUNDS INVESTED IN PLANT DURING YEAR

1. RUS, RTB, & FFB Loan Funds Expended
2. Other Long-Term Loan Funds Expended
3. Funds Expended Under RUS Interim Approval
4. Other Short-Term Loan Funds Expended
5. General Funds Expended (Other than Interim)
6. Salvaged Materials
7. Contribution in Aid to Construction
8. Gross Additions to Telecom. Plant (1 thru 7)

PART G. INVESTMENTS IN AFFILIATED COMPANIES

INVESTMENTS	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year	Income/Loss This Year	Cumulative Investment To Date	Cumulative Income/Loss To Date	Current Balance
(a)	(b)	(c)	(d)	(e)	(f)
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development					

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PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority
with jurisdiction over the provision of telephone services? (Check one)

☒

YES

☐

NO

EQUIPMENT CATEGORY

DEPRECIATION RATE

1. Land and support assets - Motor Vehicles
2. Land and support assets - Aircraft
3. Land and support assets - Special purpose vehicles
4. Land and support assets - Garage and other work equipment
5. Land and support assets - Buildings
6. Land and support assets - Furniture and Office equipment
7. Land and support assets - General purpose computers
8. Central Office Switching - Digital
9. Central Office Switching - Analog & Electro-mechanical
10. Central Office Switching - Operator Systems
11. Central Office Transmission - Radio Systems
12. Central Office Transmission - Circuit equipment
13. Information origination/termination - Station apparatus
14. Information origination/termination - Customer premises wiring
15. Information origination/termination - Large private branch exchanges
16. Information origination/termination - Public telephone terminal equipment
17. Information origination/termination - Other terminal equipment
18. Cable and wire facilities - Poles
19. Cable and wire facilities - Aerial cable - Metal
20. Cable and wire facilities - Aerial cable - Fiber
21. Cable and wire facilities - Underground cable - Metal
22. Cable and wire facilities - Underground cable - Fiber
23. Cable and wire facilities - Buried cable - Metal
24. Cable and wire facilities - Buried cable - Fiber
25. Cable and wire facilities - Conduit systems
26. Cable and wire facilities - Other

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INSTRUCTIONS – See help in the online application.

PART I – STATEMENT OF CASH FLOWS

1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)
CASH FLOWS FROM OPERATING ACTIVITIES	
2.	Net Income
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>	
3.	Add: Depreciation
4.	Add: Amortization
5.	Other (Explain)
<i>Changes in Operating Assets and Liabilities</i>	
6.	Decrease/(Increase) in Accounts Receivable
7.	Decrease/(Increase) in Materials and Inventory
8.	Decrease/(Increase) in Prepayments and Deferred Charges
9.	Decrease/(Increase) in Other Current Assets
10.	Increase/(Decrease) in Accounts Payable
11.	Increase/(Decrease) in Advance Billings & Payments
12.	Increase/(Decrease) in Other Current Liabilities
13.	Net Cash Provided/(Used) by Operations
CASH FLOWS FROM FINANCING ACTIVITIES	
14.	Decrease/(Increase) in Notes Receivable
15.	Increase/(Decrease) in Notes Payable
16.	Increase/(Decrease) in Customer Deposits
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital
20.	Less: Payment of Dividends
21.	Less: Patronage Capital Credits Retired
22.	Other (Explain)
23.	Net Cash Provided/(Used) by Financing Activities
CASH FLOWS FROM INVESTING ACTIVITIES	
24.	Net Capital Expenditures (Property, Plant & Equipment)
25.	Other Long-Term Investments
26.	Other Noncurrent Assets & Jurisdictional Differences
27.	Other (Explain) to be determined by audit
28.	Net Cash Provided/(Used) by Investing Activities
29.	Net Increase/(Decrease) in Cash
30.	Ending Cash

Revision Date 2010

<p>USDA-RUS</p> <p>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	<p>BORROWER DESIGNATION</p> <p>MO0505</p>
<p>INSTRUCTIONS - See RUS Bulletin 1744-2</p>	<p>PERIOD ENDED</p> <p>December, 2014</p>
<p>NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p>	